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FEDERAL COMMUNICATIONS COMMISSION  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Number Resource Optimization ) CC Docket No. 99-200

**OPPOSITION/ SUPPORT OF SBC COMMUNICATIONS, INC. TO PETITIONS FOR  
RECONSIDERATION AND CLARIFICATION**

SBC Communications Inc., on behalf of itself and its subsidiaries, endorses certain of the positions and opposes other positions taken by parties seeking reconsideration of the Report and Order.<sup>1</sup> Requests for the extension of the 45-day period for reserve numbers and the modification of the Commission's treatment of pending service order numbers are clearly warranted by the record, as is the redefinition of the utilization calculation. However, the granting of certain requests by state commissions and WorldCom relating to matters already thoroughly considered and rejected by the Commission not only would complicate an already complex process, but would be of no discernable benefit to the public. The optimization of numbering resources would be hindered, not advanced, by the adoption of these proposals.

**I. SBC SUPPORTS CERTAIN REQUESTS OF PETITIONERS FOR  
RECONSIDERATION AND CLARIFICATION.**

**A. THE COMMISSION SHOULD RECONSIDER ITS DETERMINATIONS  
RELATING TO THE 45-DAY RESERVE PERIOD AND NUMBERS  
RESERVED FOR PENDING SERVICE ORDERS.**

As discussed by SBC in its Petition for Reconsideration and Clarification, the reserve number time limitation is an issue of paramount importance to carriers and their customers. The

<sup>1</sup> Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, FCC 00-104, released March 31, 2000 (Report and Order).

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number of parties seeking reconsideration on this point underscores this concern.<sup>2</sup> As Qwest points out,<sup>3</sup> there is no substantial evidence on the record to support the conclusion that carrier number reservation practices contribute to number management inefficiencies. Yet, the Commission's current dictate will adversely impact existing customer practices and expectations. AT&T<sup>4</sup> and Bell South<sup>5</sup> cite examples in which named customers are harmed by the 45-day limitation, providing the only evidence on the record as to the effect of such a restriction on subscribers.<sup>6</sup> Qwest<sup>7</sup> also accurately points out the potential disparity in treatment caused in relation to Centrex and Private Branch Exchange customers. Indeed, the Association for Telecommunications Professionals in Higher Education (ACUTA) provides the Commission with first-hand information as to the how the Commission's mandates will act to the detriment of existing customer arrangements.<sup>8</sup>

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<sup>2</sup> Bell South Corporation Petition for Reconsideration and Clarification (BellSouth Petition), pp. 5-11; Qwest Corporation Petition for Reconsideration (Qwest Petition), pp. 1-2, 8; Sprint Petition for Reconsideration and Clarification (Sprint Petition), pp. 1-2; the Petition for Clarification and/or Reconsideration of the United States Telecom Association (USTA Petition), pp. 11-12; Verizon Petition for Suspension of the Enforcement Date and Reconsideration, (Verizon Petition) pp. 2, 4; AT&T Corp. Petition for Reconsideration (AT&T Petition), pp. 6-8 and Petition for Reconsideration and Clarification of WorldCom, Inc. (WorldCom Petition), p. 7.

<sup>3</sup> Qwest Petition, p. 8.

<sup>4</sup> AT&T Petition, p. 7.

<sup>5</sup> BellSouth Petition, pp. 6-8.

<sup>6</sup> This position is further bolstered by the ex parte letters filed with the Commission by several local and state entities. *See, e.g.* Ex Parte of Cypress-Fairbanks Independent School District, filed May 1, 2000; Ex Parte of the City of Tulsa Oklahoma, filed April 24, 2000; the Ex Parte of the Mayor of Raytown Missouri, filed May 12, 2000; the Ex Parte of the Washington State Department of Information Services, filed July 14, 2000; the Ex Parte of the State of Illinois Department of Central Management Services, filed May 19, 2000.

<sup>7</sup> Qwest Petition, p. 11.

<sup>8</sup> ACUTA Petition for Declaratory Ruling or Clarification, pp. 1-9.

The Commission should acknowledge the reasonableness of these concerns. Even if there is support in the record for some time limitation to be imposed on the reserving of numbers, there is no valid evidence that this time period should be set at 45 days. The Commission must acknowledge the demonstrated adverse effect of this restriction and reopen the record or it must modify its dictates to reflect the realistic NANC recommendation, supported by the industry.<sup>9</sup>

Similarly, the Commission should readdress the issue posed by restricting the reservation of numbers for pending service orders. As discussed by the various parties seeking consideration on this point,<sup>10</sup> numbers needed to support service order requests must be retained until such time as the order is completed or terminated by the customer. The Commission's current dictate that these numbers should not be reserved beyond a 50-day period (five days as pending numbers and 45 days as reserved numbers) is contrary to its own espoused objective of ensuring the efficient use of number resources and protecting customers from unnecessary expense and inconvenience.<sup>11</sup> USTA's description of the harm caused by the Commission's failure to recognize customer needs in this regard is clear and unequivocal.<sup>12</sup> Moreover, the record is devoid of any evidence that numbers associated with pending orders are being used by carriers to "hoard" excess numbering resources. For these reasons, numbers associated with pending service should not be recognized as reserved for only 50 days. In addition, since these numbers are assigned to meet a specific customer request for service and cannot be used for any other purpose, these numbers should appropriately be treated as assigned numbers for purposes of calculating utilization.

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<sup>9</sup> See, e.g. Verizon Petition, p. 4.

<sup>10</sup> USTA Petition, pp. 2-3; Verizon Petition, p. 2; AT&T Petition, pp. 9-10; WorldCom Petition, p. 6.

<sup>11</sup> Report and Order, ¶1.

<sup>12</sup> USTA Petition, pp. 5-9.

**B. The Commission must redefine its utilization calculation to properly reflect numbers which are outside a carrier's control.**

As noted by various Petitioners,<sup>13</sup> the Commission's current utilization calculation distorts the actual numbers available for assignment by the carrier and misrepresents the actual character of numbering resources. As Verizon recognizes,<sup>14</sup> the numerator in any utilization calculation should include aging, reserved and administrative numbers in addition to assigned numbers. The same is true in relation to numbers assigned for internal company purposes and intermediate numbers as addressed by SBC's Petition. Those numbers which are not available for assignment to other customers must be properly reflected in the utilization calculation. Otherwise, the utilization calculation does not accurately reflect the numbers which are available for assignment.

**II. SBC OPPOSES THE PROPOSALS OF CERTAIN PETITIONERS.**

**A. The Commission should not set a 75% utilization threshold using its current utilization calculation nor should it apply the threshold to pooling carriers.**

The Commission should not adopt the proposals of the Maine Public Utilities Commission (MPUC) and the California Public Utilities Commission (CPUC) related to the utilization threshold and its application. The CPUC<sup>15</sup> and MPUC<sup>16</sup> request that the Commission set a 75% utilization threshold as the pre-condition a carrier must meet before it is permitted to open a new block, basing this percentage upon the CPUC's own experience in California. Yet, the utilization calculation used in California is entirely different from that contained in the Report and Order.

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<sup>13</sup>Verizon Petition, pp. 5-6; USTA Petition, p. 15; Bell South Petition, pp. 11-15.

<sup>14</sup> Verizon Petition, pp. 5-6.

<sup>15</sup> Petition for Reconsideration and Clarification by the California Public Utilities Commission and the People of the State of California (CPUC Petition), pp. 3-7.

<sup>16</sup> Petition for Reconsideration and Clarification by Maine Public Utilities Commission (MPUC Petition), p.3-5.

Unlike the Commission's rules, the CPUC allows aging numbers, reserved numbers, administrative numbers and assigned numbers is used to calculate fill rates.<sup>17</sup> Unless the Commission reconsiders its current utilization calculation and orders one consistent with the CPUC's current practice, the adoption of a 75% utilization threshold is unjustifiable. Nor is the position of the MPUC supportable since it relies on the CPUC's "experience."<sup>18</sup>

Nor should the Commission impose a utilization threshold on pooling carriers as proposed by the CPUC<sup>19</sup> and the MPUC. The SBC companies serve many growing areas, which consume 1000 numbers or more in a single month. A 75% utilization requirement imposed on pooling carriers could force these carriers to reduce their inventories to as few as 250 available numbers in a rate center before they could submit a request for additional resources. The proposed utilization level would in many cases force pooling carriers to maintain a lower inventory than that which is required to meet the Commission's six-month inventory rule.<sup>20</sup> SBC's experience in Illinois is that we have difficulty maintaining sufficient inventory in a thousands-block pooling environment, even absent a utilization threshold. In several situations, a request for additional number blocks has necessitated the opening of a new NXX code, which requires a 66-day standard activation interval, as specified in the INC Central Office Code Assignment Guidelines.<sup>21</sup> If a utilization threshold was established in a pooling area, a provider could lack the requisite spare numbers for assignment to customers during the period that the

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<sup>17</sup> Reply Comments of the California Public Utility Commission and the People of the State of California, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, filed June 9, 2000, at pp. 2-3.

<sup>18</sup> MPUC Petition, p. 3.

<sup>19</sup> CPUC Petition, pp.3-7; MPUC Petition, pp.3-5.

<sup>20</sup> Report and Order, ¶ 189.

<sup>21</sup> Central Office Code Assignment Guidelines, June 19, 2000 issue, para. 6.1.2.

activation of a new NXX code is pending. For these reasons, the Commission must maintain its current requirement that utilization thresholds only be established in non-pooling areas.

**B. INC guidelines should not be made subject to state and federal regulatory review and approval.**

The MPUC recommends the establishment of a federal and state committee to oversee the establishment of INC guidelines.<sup>22</sup> This cumbersome formal process would only serve to hinder industry attempts to comply with federal dictates by interjecting still another layer of review. Regulatory bodies have the right to participate in the development of the INC guidelines; in fact, meeting fees are waived to encourage their attendance. All INC schedules and working drafts of documents are posted to the INC web site. NARUC representatives at the NANC regularly receive INC status reports. If the state commissions believe that their involvement is essential to the development of technical industry guidelines, then they should participate in the creation of these guidelines. The participation of regulatory entities in the existing INC process would not delay the implementation of new or modified procedures and practices, as could a separate regulatory review process.

**C. A number pooling time table which would require the conversion of six NPAs per quarter is unachievable.**

The Florida Public Service Commission (FPSC) asks the Commission to adopt an extremely aggressive schedule for national number pooling. The conversion of six NPAs each quarter<sup>23</sup> greatly exceeds the capabilities of carriers. The record lacks any evidence that suggests that such a time schedule is possible. While SBC agrees that an expedited implementation schedule is in the best interests of the public, the FPSC proposal is overly aggressive and unsupported by the record.

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<sup>22</sup> MPUC Petition, pp. 7-10.

<sup>23</sup> Petition for Reconsideration of the Florida Public Service Commission (FPSC Petition), p. 6.

**D. The Commission should continue to reject arguments in favor of unassigned number porting (UNP).**

WorldCom still again argues that the Commission should ignore its prior decisions relating to state commission interim authority and order UNP, either as part of the national numbering plan or as part of a mandatory state trial.<sup>24</sup> Obviously, what WorldCom lacks in support for its proposal, it seeks to make up for in persistence. Neither the record, nor WorldCom's statement that existing systems are "sufficient to support certain UNP applications," warrant the adoption of mandatory UNP under any terms. A trial between two consenting carriers employing a manual, paper process cannot be deemed to offer credible information as to the technical and practical feasibility of non-voluntary UNP. Numerous issues remain unaddressed. As previously demonstrated to the Commission, UNP will adversely impact the long-term number portability network, it will reduce the benefits derived from Efficient Data Representation (EDR) and will effect the abilities of carriers to forecast their future NXX and thousand-block needs. The Commission must remain firm in its rejection of UNP.

**E. The reporting of donated numbers is of no ascertainable benefit and would distort the reporting process.**

SBC is frankly baffled by WorldCom's proposal that the Commission require donating carriers to continue to report <sup>25</sup> "reserved" ported numbers as its own reserved numbers until the carrier which has received these numbers either assigns them or returns them to the donating carrier.

The rationale in support of such a request is nonexistent. Suffice it to say that once a donating carrier has ported these numbers to another carrier, these numbers are no longer within its numbering inventory. The donating carrier has no knowledge as to when these reserved numbers are then activated by another carrier. To argue that the donating carrier has some continuing obligation to include the ported numbers in its inventory is patently absurd.

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<sup>24</sup> WorldCom Petition, p. 10.

<sup>25</sup> WorldCom Petition, p. 5.

**F. Numbers should not be assigned out of sequence in response to a customer request.**

WorldCom takes the position that a “genuine request from a customer is a sufficient reason to assign numbers out of sequence.”<sup>26</sup> SBC disagrees. To assign a number out of sequence simply because of a customer vanity request would serve to needlessly contaminate thousands-blocks and undercut the Commission's efforts to aggressively address number conservation. In order to optimize adopted measures, the Commission must continue to assert that numbers are to be sequentially assigned unless precluded by technical limitations. Vanity requests do not and should not fall within such an exception.

**G. The Commission should continue to reject Technology Specific Overlays (TSOs).**

The Ohio Public Service Commission again raises the issue of TSOs, stating that such measures “provide relief while providing minimal disruption to subscribers within the state.”<sup>27</sup> The record in this proceeding shows otherwise. TSOs will create a new demand for NPAs while failing to significantly extend the exhaust dates for existing NPAs, particularly with regard to the top 100 MSAs. In fact the TSO concept is contrary to basic number optimization principles. Indeed, the adoption of this proposal could result in the immediate assignment of as many as 100 new, previously unforecasted NPAs.

As overlays, TSOs involve mandatory 10-digit dialing. If the Commission were to allow or require TSOs, wireless *and* wireline customers served in the area covered by the TSO would be required to dial 10-digits on all calls, unless the Commission granted a waiver of this requirement. Given the FCC’s reluctance to permanently waive its 10-digit dialing requirement in overlay situations, it is difficult to believe that the OPSC has carefully considered the outcome of its proposal.

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<sup>26</sup> WorldCom Petition, p. 10.

<sup>27</sup> Petition for Reconsideration of the Ohio Public Service Commission, p. 20.



As SBC has previously pointed out, the extension of number portability to wireless carriers will eliminate any TSO distinction and terminate any TSO which has been implemented. Once wireless and wireline numbers are portable between the two technologies, an identifiable technology specific numbering scheme will not be possible. This consequence is also true when wireless companies participate in number pooling and blocks are shared by all service providers.

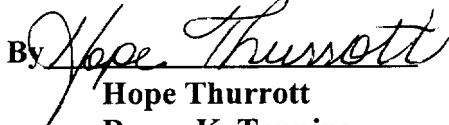
The Commission has already developed a complete record on this issue and come to the correct conclusion that TSOs are of no true benefit in terms of number conservation. It should remain firm in its resolve.

### **CONCLUSION**

The Commission should reconsider those aspects of the Report and Order which adversely impact customers requiring reserve numbers, including those held in reserve for pending service orders. The adoption of a 45-day reserve period is unjustified by the record. Moreover, the utilization calculation adopted by the Commission should accurately reflect those numbers which a carrier can assign. These modifications, unlike other revisions opposed above, will further the Commission's objective of number resource optimization.

**Respectfully Submitted,**

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August 15, 2000

## **CERTIFICATE OF SERVICE**

I, Loretia Hill, do hereby certify that on this 15th day of August 2000, a copy of the foregoing "Petition" was served by U.S. first class mail, postage paid, to the parties listed on the attached sheets.

A handwritten signature in black ink, appearing to read "Loretia Hill", written over a horizontal line.

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